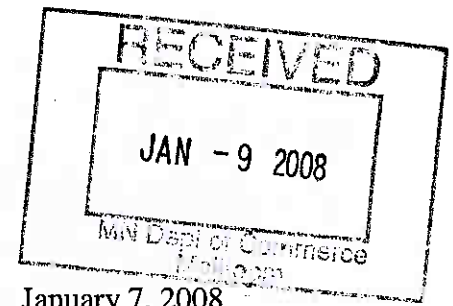


Mr. Bill Storm
Minnesota Department of Commerce
85 7th Place, Suite 500
St. Paul, MN 55101-2198



Dear Bill,

January 7, 2008

Thank you for the opportunity to comment on the draft Environmental Impact Statement for the proposed Excelsior Energy power plant. My comments concern two related issues.

First concern: The draft Environmental Impact Statement barely acknowledges the presence of lake trout at Canisteo, near Grand Rapids, and does not discuss nor describe the fishery in any meaningful detail. This error of omission (or commission?) has occurred in spite of direct testimony given during the EIS scoping process that pointed out the presence of the cold-water fishery and requested that the potential impact to the fishery be adequately evaluated.

Consider this: In our entire state only 122 lakes are managed for lake trout, and of the thousand-plus lakes in Itasca County only five support lake trout populations. Canisteo, which Excelsior wants to take from the public, is undoubtedly the most productive and accessible of those five water bodies. Why does the draft Impact Statement not adequately discuss or describe this cold-water lake trout fishery, and why does the draft EIS not discuss potential thermal, chemical or other impacts to the fishery? Why does the draft EIS not describe mitigation alternatives that would preserve the continued existence and health of the fishery? Is potential destruction of a major cold-water trout fishery not significant enough to address in the EIS?

Second concern: Excelsior Energy's proposal to eliminate public access to one of the State's largest lake trout fisheries is not adequately addressed and is simply appalling.

Canisteo ranks as the sixth largest lake trout fishery by size in the entire state, and its total acreage places it among the 250 largest recreational lakes in Minnesota. Excelsior's plan to close Canisteo to recreational boating and fishing, so that the water body can instead be used as a ditch to carry water to the power plant gets only cursory mention in the draft EIS. One would think that a proposal for the taking of a major public recreational water body and its conversion for exclusive private use would need much more thorough description, evaluation, critique and validation. To conduct such a major taking of a publicly accessible recreational resource without exploring all possible alternatives would be a shame.

The draft EIS contends that Holman Lake will accommodate the loss of recreational, boating and fishing activities on the five mile long, 330 feet deep, 1,300+ acre Canisteo water body. I find it hard to imagine how that will be possible. Water clarity at Canisteo is rated at a phenomenal 43 feet, lake trout growth is listed at 115% above the statewide average, and natural reproduction of lake trout is occurring. By contrast, Holman Lake has no lake trout habitat and is about one tenth the acreage.

Would we close Burntside Lake for the sake of 100 jobs? For the sake of another 100 jobs would we shut down the aquatic recreational opportunities at lakes Calhoun, Harriet, Cedar, Nokomis, Hiawatha and Lake of the Isles, whose combined acreage is less than that proposed to be closed by Excelsior?

The Canisteo water body is a tremendous asset to Itasca County and to Minnesota. Let's acknowledge that. Revise the draft EIS to thoroughly inform decision-makers about potential environmental impacts to the Canisteo cold-water fishery and the recreational resource. Keep the water cold and clean, the fishery healthy, and maintain public access to this gem. If Excelsior can propose to build a 400-mile pipeline to carry carbon dioxide to North Dakota, then surely its water intake pipe from the Prairie River can bypass the Canisteo, and the plant's warm water discharge can be sent to some more appropriate, less vulnerable water basin. If Canisteo is so uniquely critical to the power plant plan, then Excelsior should make at minimum a 2:1 replacement of the recreational and cold-water fishery loss.

Sincerely,



David Dahl
9016 Lahti Road
Hibbing, MN 55746

Enclosures:

1. Page printed from the MnDNR web site regarding trout fishing.
2. 2005 narrative report from the MnDNR web site describing the Canisteo fishery.



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Trout lakes



There are two types of trout lakes. One mainly contains lake trout. These are called **lake trout lakes**. The other mainly contains stream trout (rainbow, brook, brown, and a hybrid of lake trout and brook trout called splake). These are called **stream trout lakes**.

Trout lakes are primarily in northeastern Minnesota, though some are as far south as Rochester. These lakes are extremely popular with anglers, who like trout for their beauty, fight, and taste--not to mention the fact that many trout lakes are amidst some of Minnesota's wildest, most scenic settings.

Anglers looking for information on specific trout lakes can find it in the [trout lake list](#). This shows the trout species present for all trout lakes, listed by county. And it includes links to lake information such as stocking, map, fish consumption advisory, and water quality.

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[Consumption Advice](#)" pages at the [Minnesota Department of Health](#).

Status of the Fishery (as of 08/15/2005)

This population assessment was conducted during mid August using lake survey gill nets, which were set in 40 to 80 feet of water to target lake trout. Temperature and dissolved oxygen levels measured during the survey indicated that suitable lake trout habitat where water temperatures were less than 54 °F and dissolved oxygen levels were above 6.0 ppm was present below 35 feet. Lake trout have been stocked annually since 1996 with both yearlings and larger broodstock sometimes both in the same year. All yearling fish and larger brood stock had a fin clipped that could be used to designate the year class for future evaluations. The use a specific fin clip associated with a known year class and strain, allows ageing of individual lake trout captured at a later date with some certainty without using boney structures (scales or otoliths).

A total of 25 lake trout were captured which yielded a catch rate 1.7 fish/set, which is similar to the catch rate of 1.9 fish/set from the previous 2000 assessment. Fin clip examinations on 22 captured lake trout revealed that twelve fish had fins removed. Nine of these fish had their left pelvic fin removed and three fish had their right pelvic fin removed. Those lake trout with their left pelvic fin removed had originated from either the 1993 or 1998 year classes and ranged in lengths from 19.3 to 31.5 inches. Although assignment of these fish to a specific year class was uncertain for fish in the middle size range, five fish that exceeded 29.5 inches in length were presumed to be from the 1993 year class (age-12 fish) and three of the smaller fish with individual lengths of 19.3, 22.6, and 25.2 inches were presumed to be from the 1998 year class (age-7 fish). There were also three fin clipped lake trout in the catch with a right pectoral fin removed indicating they were from the 1995 or 2000 year class. Since these lake trout ranged from 28.7 to 31.5 inches in length they were presumed to be from the 1995-year class (age-10 fish).

Determining growth and survival for individual lake trout in the catch was difficult since lake trout from year classes, 1993, 1995, and 1998 were stocked at various sizes and ages. For example, lake trout from the 1993-year class were stocked several times in the late 1990's at various ages and sizes while fish from the 1995-year class may have originated from yearlings stocked in 1996, or as larger fish in 1997, or 2004. The 1998-year class was stocked as yearlings in 1999 and again as larger fish in 2002 and 2004. The only thing that can be surmised from correlating the fin clips of captured fish with the stocking records was that five of the largest fish with a left pelvic fin clip had survived for at least seven years since this year class had last been stocked in 1998.

The presence of 10 unclipped lake trout in the catch indicates that **natural recruitment is occurring**. The possibility of fin regeneration was discussed with personnel from the state trout hatchery, which provided the fin clipped lake trout. The regeneration of clipped fins was quickly dismissed as a possible explanation as hatchery staff have rarely observed any fish raised to adults for gamete production that have regenerated their clipped fins. These 10 unclipped lake trout ranged in size from 15.0 to 25.2 inches and aging from scale samples indicated that these fish were from ages 2 through 5. **These fish appear to be fast growing after attaining age-1 as their back-calculated means exceeded the statewide averages by more than 115%.**

Several other species were caught with trap nets in relatively low abundance and included small bluegill (mean weight=0.2lbs), black crappie, largemouth and smallmouth bass, and rock bass.